

Request for Conditional Closure

Site: Boneyard B, also known as Two-Party Agreement (TPA) Site 15 and National Oceanic and Atmospheric (NOAA) Site 15

Location: St. George Island, Alaska is approximately 800 miles southwest of Anchorage in the Bering Sea. On the island, Boneyard B is located southeast of the city landfill on a spur road that veers west from the landfill road (56° 34' 33.13" N latitude, 169° 35' 1.79" W longitude; Figures 1 and 2).

Legal Property Description: Boneyard B is located in Township 42 South, Range 130 West, Section 1 of the Seward Meridian, Alaska, as shown on the plat of rectangular net survey, officially filed February 15, 1985 (Figure 2). The St. George Tanaq Corporation owns the surface estate, and The Aleut Corporation owns the subsurface estate.

Type of Release: Abandoned materials including drums, vehicles, transformers, aboveground storage tanks (ASTs), vehicle batteries, and miscellaneous debris (Buckel 1990, NOAA 1996). Soil staining, presumably derived from the abandoned items, was identified (Polarconsult 1997a).

History and Background:

The site was primarily used for the disposal of abandoned vehicles, though other debris noted above were also disposed at the site.

Summary of Site Investigations:

Harding Lawson Associates (HLA; 1993) conducted a Phase I Environmental Assessment of the Pribilof Islands during September and October 1992. HLA found Boneyard B (also referred to as Vehicle Boneyard 1) to contain approximately 75 abandoned vehicles and three transformers. Drums were scattered between Boneyards B and C. HLA activities included draining and bulking vehicle fluids and locating and sampling transformers. Wipe samples collected from inside the transformers indicated the presence of polychlorinated biphenyls (PCBs) ranging from 0.10 to 1.39 ug/cm².

Ecology and Environment, Inc. (E&E) conducted a preliminary assessment for this site based on interviews, available literature and files, and an early October 1992 site visit (E&E 1993). They noted the western half of Boneyard B contained 15 vehicles and the eastern half contained approximately 35 vehicles, two motorcycles, three transformers, and other miscellaneous metal debris, including batteries. Thirteen drums were noted as being scattered between Boneyards B and C. One drum was filled with water, another contained an unknown solid; the others were empty. E&E did not note signs of stained soil or stressed vegetation during the site visit.

During 1993, Woodward-Clyde conducted a Phase 1B environmental assessment (Woodward-Clyde 1994). Drums were inventoried, and 20 were removed from Boneyard B as well as another 10 from between Boneyards B and C. Seven batteries and two of the three transformers previously identified were also removed. The remaining transformer was partly buried and

pinned beneath a truck. The transformer did not appear to contain any liquid, and Woodward-Clyde did not observe staining or stressed vegetation around the transformer. Accessible vehicles were inspected for fluids and found to contain none.

Polarconsult Alaska, Inc. (Polarconsult) conducted a site investigation in 1996 and 1997 (Polarconsult 1997a and 1997b). Initial work involved the removal of debris items, including vehicles and equipment, revealing the presence of soil stains on the ground surface. Sixteen shallow test pits were excavated where soil discoloration suggested the presence of soil contamination and in other locations where debris items may have released fuel (Figure 3). Four individual soil samples were analyzed for gasoline-range organics (GRO), benzene, toluene, ethylbenzene, and xylenes (BTEX). Three composite samples were analyzed for metals, diesel-range organics (DRO), and residual-range organics (RRO). Only DRO in one of the composite samples (group 2) was found to exceed its preliminary cleanup level of 200 mg/kg with a concentration of 3,620 mg/kg.

During August 2000, Polarconsult conducted site assessment activities at Boneyard B (Polarconsult 2001). Polarconsult located the test pits from which each of the individual 1997 composite group 2 samples (*i.e.*, samples SS 171 to SS 175) were collected. These test pits were resampled, and samples were individually analyzed for DRO and BTEX. BTEX was not detected. DRO results varied from not detected to a maximum concentration of 205 mg/kg, with only one sample, SS 256, exceeding the preliminary cleanup level of 200 mg/kg (Figure 3). This sample was collected from the same location as 1997 sample SS 172.

No groundwater monitoring wells have been installed at Boneyard B; thus, no groundwater data is available for the site. The site is located 2.3 miles from the St. George municipal drinking water wells.

Summary of Applied Cleanup Levels:

Alaska Department of Environmental Conservation (ADEC) Method I cleanup criteria (18 AAC 75.341 (a); ADEC 1999) were applied at this site. Site information gathered during the final cleanup action and applied to a Table A1 calculation indicates that this site falls under Method 1, Category C with GRO, DRO, and RRO cleanup levels of 500, 1,000, and 2,000 mg/kg, respectively (Polarconsult 2001). Accordingly, these are the levels applied to the final cleanup action. During the aforementioned site investigation and assessment activities, however, based on the best available information at that time, more stringent Method 1, Category B cleanup levels (*e.g.*, 200 mg/kg DRO) were used as the preliminary cleanup levels to guide decisions.

Summary of Cleanup Actions:

During September 2000, Polarconsult conducted removal activities at Boneyard B in the vicinity of the sample SS 256 location (Polarconsult 2001). Approximately 65 cubic yards of soil were removed (Figure 4). Polarconsult collected five confirmation samples following the soil removal action (Figure 4). The samples were analyzed for DRO and BTEX. DRO was detected in just one sample at a concentration of 15.9 mg/kg, below the site cleanup level. BTEX was not detected. The site was backfilled with clean scoria and regraded.

Recommended Action:

In accordance with paragraph 59 of the Two Party Agreement (NOAA 1996), NOAA requests written confirmation that NOAA completed all appropriate corrective action, to the maximum extent practicable, at Boneyard B, TPA Site 15/Site 15 in accordance with the Agreement and that ADEC grant a conditional closure not requiring further remedial action from NOAA. NOAA understands ADEC will/may require additional containment, investigation, or cleanup if subsequent information indicates that the level of contamination that remains does not protect human health, safety, or welfare, or the environment.

References:

- Alaska Department of Environmental Conservation (ADEC). 1999. Title 18 of the *Alaska Administrative Code* 75, Articles 3 and 9. *Oil and Hazardous Substances Pollution Control Regulations*. State of Alaska.
- Buckel, Steven. 1990. *Environmental Compliance Survey Report – Pribilof Islands, Alaska*. National Oceanic and Atmospheric Administration. August 31.
- Ecology and Environment, Inc. (E&E). 1993. *Preliminary Assessment of National Oceanic and Atmospheric Administration Sites, Pribilof Islands, Alaska*. February.
- Harding Lawson Associates (HLA). 1993. *Final Report, Phase I Environmental Assessment, Pribilof Islands, Alaska*. March 5.
- National Oceanic and Atmospheric Administration (NOAA). 1996. Pribilof Islands Environmental Restoration Two-Party Agreement, Attorney General’s Office File No. 66 1-95-0126. National Oceanic and Atmospheric Administration. January 26, 1996.
- Polarconsult Alaska, Inc. 1997a. *Environmental Site Investigation, St. George Debris Cleanup and UST Decommissioning, Pribilof Islands Environmental Restoration Project, Volumes I and II*. November.
- Polarconsult Alaska, Inc. 1997b. *Environmental Site Investigation, St. George Debris Removal Report, Pribilof Islands Environmental Restoration Project, Volume III*. December.
- Polarconsult Alaska, Inc. 2001. *Draft Environmental Site Investigation, St. George Environmental Cleanup, Pribilof Islands Environmental Restoration Project, Part II (Revision 2)*. December.
- Woodward-Clyde Consultants, Inc. 1994. *Phase 1B Environmental Assessment, St. George Island, Alaska*. March.

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Boneyard B
TPA 15/Site 15
St. George Island, Alaska

For the National Oceanic and Atmospheric Administration

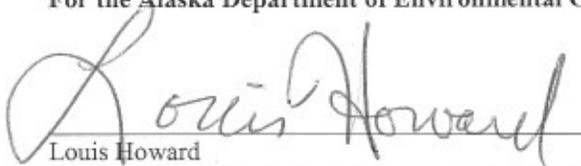


John Lindsay
NOAA, Pribilof Project Office

1/31/05
Date

Approvals: In accordance with Paragraph 59 of the Two Party Agreement, this is to confirm that all corrective action has been completed to the maximum extent practicable at Boneyard B, TPA Site 15/Site 15 in accordance with the Agreement and that no further remedial action is required as a part of this conditional closure granted by ADEC.

For the Alaska Department of Environmental Conservation



Louis Howard
Alaska Department of Environmental Conservation
Remedial Project Manager

2/11/05
Date

Figures

Request for Conditional Closure
Boneyard B
TPA 15/Site 15
St. George Island, Alaska

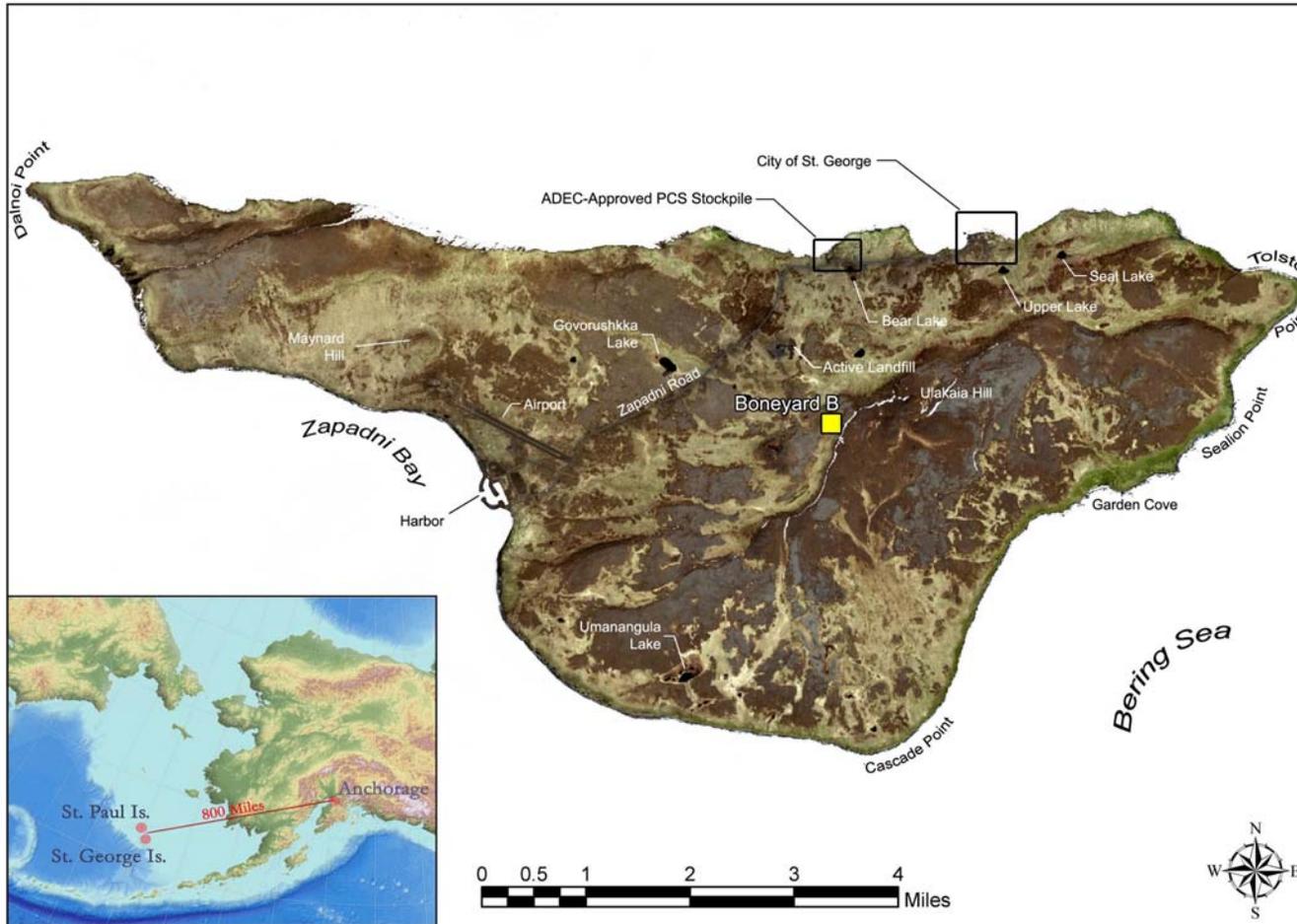


Figure
1

**Island & Vicinity Map
TPA Site 15/Site 15
Boneyard B
St. George Island, Alaska**

Source: Ikonos 2001 Satellite Image



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Boneyard B
TPA 15/Site 15
St. George Island, Alaska



Figure
2

**Legal Property Description Map
TPA Site 15/Site 15
Boneyard B
St. George Island, Alaska**

Source: Ikonos 2001 Satellite Image;
Bureau of Land Management Land
Survey Filed February 15, 1985



**Request for Conditional Closure
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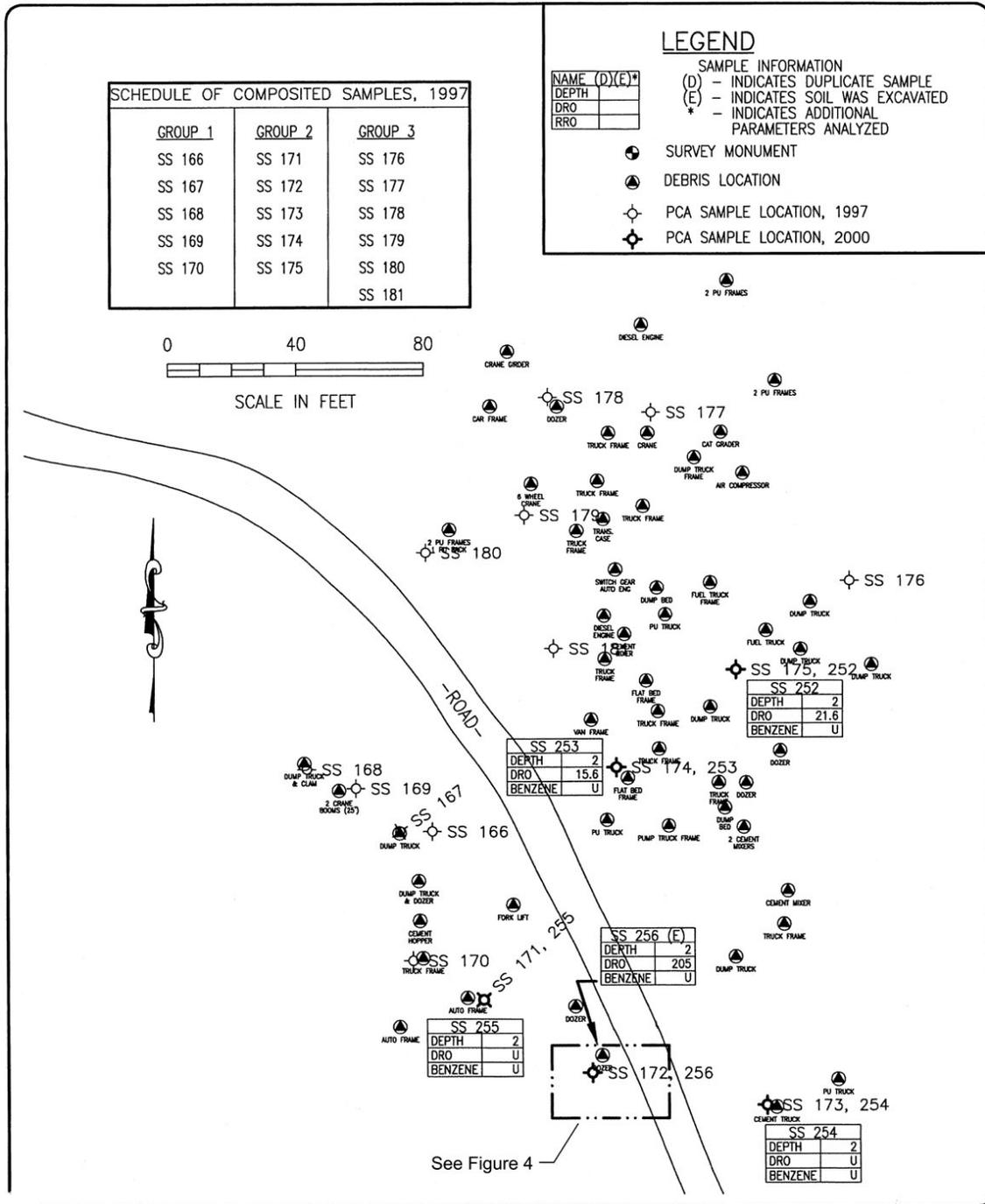


Figure
3

Sample & Debris Locations
1997 & 2000
TPA Site 15/Site 15, Boneyard B
St. George Island, Alaska

Source: Adapted from the
Draft Environmental Site
Investigation report,
Polarconsult 12/31/2001



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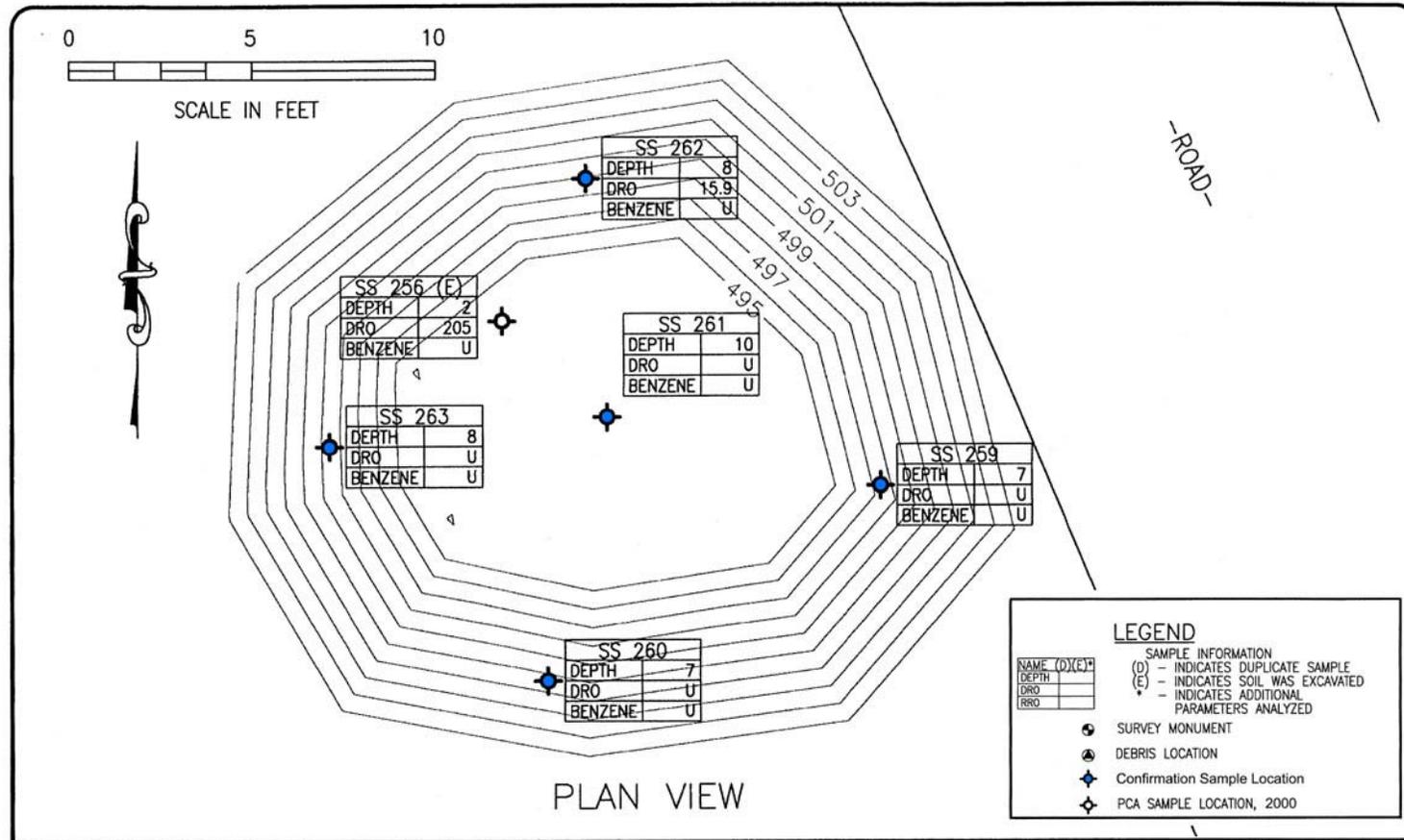


Figure
 4

Excavation & Confirmation Sample Locations
 2000 Remedial Action
 TPA Site 15/Site 15, Boneyard B
 St. George Island, Alaska

Source: Adapted from the
 Draft Environmental Site
 Investigation report,
 Polarconsult 12/31/2001

